

LAURA CURRAN
County Executive

JARED A. KASSCHAU
County Attorney



**COUNTY OF NASSAU
OFFICE OF THE COUNTY ATTORNEY**

August 4, 2020

Via ECF

Hon. Roslynn R. Mauskopf
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Williams v. Mangano, et al.
CV-17-2667 (RRM) (AKT)

Dear Judge Mauskopf:

The County Attorney's Office represents Nassau County Detectives William Bourguignon, Leonard Mathewson, Hector Bourren, Jason Wrieske, Jason Collins and Damian Suarez (hereinafter collectively referred to as the "Defendants"), the remaining defendants in the above-referenced action. In accordance with Section III.B.6 of this Court's Individual Rules, please be informed that the following documents, constituting Defendants' fully briefed motion for summary judgment (see Electronic Order 8/4/20) are enclosed:

1. Notice of Motion (DE 53)
2. Statement of Facts Pursuant to Local Civil Rule 56.1 (DE 54)
3. Notice to Pro Se Litigant who Opposes a Motion for Summary Judgment (DE 54-1)
4. Memorandum of Law in Support of Defendants' Motion (DE 55)
5. Exhibit A – Summons and Complaint (DE 55-1)
6. Exhibit B – Answer (DE 55-2)
7. Exhibit C – Arrest Report (DE 55-3)
8. Exhibit D – Crime Report (DE 55-4)
9. Exhibit E – Page 13 of Plaintiff's Deposition Transcript (DE 55-5)
10. Exhibit F – Pages 52-53 of Plaintiff's Deposition Transcript (DE 55-6)
11. Exhibit G – Gerod Mobley's Statement (DE 55-7)
12. Exhibit H – Pages 140-146 of Plaintiff's Deposition Transcript (DE 55-8)
13. Exhibit I – Pages 97-98 of Plaintiff's Deposition Transcript (DE 55-9)
14. Copies of cases referenced in Memorandum of Law that only have citations to an Online Database:
 - a. *Sargent v. County of Nassau*, 2007 WL 778437 (DE 55-10)
 - b. *Rebensdorf v. City of New York*, 2015 WL 6438765 (DE 55-11)
15. Certificate of Service for Motion papers (DE 56)

Thank you for your time and attention.

Respectfully submitted,

Liora M. Ben-Sorek
Liora M. Ben-Sorek
Deputy County Attorney

cc: Jessica Ashley Williams (Via ECF and First-Class Mail) (without enclosures)
Plaintiff *Pro Se*